

FILED  
HARRISBURG PA

JUL 24 2025

CIVIL COMPLAINT FORM TO BE USED BY A *PRO SE* PRISONERIN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAPER MJ  
DEPUTY CLERKJeremiah Wood 05-3176  
Full Name of Plaintiff Inmate Number

4:25-CV-1355-DFB

Civil No. former 1:25-CV-1001  
(to be filled in by the Clerk's Office)Judge William Carlucci  
48 W 3d Street  
Williamsport PA 17701  
Name of Defendant 1☒ Demand for Jury Trial☐ No Jury Trial DemandDA Tom Marino  
48 W 3d Street  
Williamsport PA 17701  
Name of Defendant 2ASST. DA JESSICA Faesa Esq.  
48 W 3d Street  
Williamsport PA 17701  
Name of Defendant 3Lieutenant Rogers et al.  
48 W 3d Street  
Williamsport PA 17701  
Name of Defendant 4Head Judge Nancy Butts  
48 W 3d Street  
Williamsport PA 17701  
Name of Defendant 5(Print the names of all defendants. If the names of all  
defendants do not fit in this space, you may attach  
additional pages. Do not include addresses in this  
section).

## I. NATURE OF COMPLAINT

Indicate below the federal legal basis for your claim, if known.

- ☒ Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Civil Rights Action under Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971) (federal defendants)
- ☐ Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States

Constitution 8th amendment

Defendant 2:

~~WFO~~ Carlucci William

Name (Last, First)

Common Pleas Judge

Current Job Title

48 W 3d Street

Current Work Address

Williamspart PA 17701

City, County, State, Zip Code

Defendant 3:

~~DA~~ Thomas Marino

Name (Last, First)

District Attorney

Current Job Title

48 W 3d Street

Current Work Address

Williamspart PA 17701

City, County, State, Zip Code

Defendant 4:

Assistant DA Jossica Feese

Name (Last, First)

Assistant DA

Current Job Title

48 W 3d Street

Current Work Address

Williamspart PA 17701

City, County, State, Zip Code

Defendant 5:

Common Pleas Head Judge Nancy Port

Name (Last, First)

~~Head~~ Head Common Pleas Judge

Current Job Title

48 W 3d Street

Current Work Address

Williamspart PA 17701

City, County, State, Zip Code

### III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

A. Describe where and when the events giving rise to your claim(s) arose.

Plaintiff submits the additional facts related to suit for equitable and legal relief against Judges Britt, Carlucci and DA Marino and Asst. DA Fosse in amending the complaint in former case No. 1:25-cv-1001 - after submitting in former

B. On what date did the events giving rise to your claim(s) occur?

Consistent w/ <sup>submitting in former</sup> ~~Twombly~~ and <sup>passports,</sup> ~~label of plaintiff's~~ <sup>passports,</sup> ~~are following facts (See below) related to the~~ <sup>passports,</sup> additional, amended complaint relief:

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?)

1. Plaintiff Wood is incarcerated in Lycoming County Prison.
2. On 7/17/25, Plaintiff requested at a hearing before Common Pleas Judge Carlucci, who Head common Pleas Judge Britt's appeals, with Assistant DA Fosse, who then Marino opposes, an emergency or expedited furlough request to visit his terminally ill son in hospice (also called gata house).
3. Physicians informed Wood and his two year old son's mother, that son had two weeks to live.
4. Assistant DA did not oppose furlough, but asked court to impose an extra monitor on Wood.
5. So, Son's, Britt supervised Carlucci held he would only allow furlough if
  - a) be accepted by Carlucci
  - b) pay for constable
 (See back)

- c. be clothed in prison clothing
- d. have <sup>wrist</sup> shackles and ankle shackle
- e. Be in custody of constables
- f. visit for maximum of 2 hours

6. Weed's PD Richard Dixon argued these conditions were unrealistic and onerous, even impossible. (arguably argumentative under Twombly Iqbal).

7. Incarcerated plaintiff lacks the means, financial and otherwise, to a) hire a constable (fact Ta);  
b. find a constable to hire (fact Tb)

8. Witness Probation officer Christopher Lavallee has depicted Weed as a menace to society. (arguably argumentative)

9. Plaintiff asks court to take notice of William Gray's San Gazette article Matthew Carver, A Blessing: mother looks back on journey to bring son home after 831 days. Friday may 16, 2025 (discussing the financial strain of travel expenses and childcare... The Amount of stress... feeling unwell... panic attacks... [related to] bronchopulmonary dysplasia and bronchomalacia "Soto syndrome" of her son Jaxyn, the son of plaintiff Weed.

**IV. LEGAL CLAIM(S)**

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

Plaintiff argues the Judge's sua sponte imposition of unrealistic and impossible foreign conditions which do further prevent Wood from visiting his dying son, constitute cruel and unusual punishment under the 8th amendment of Constitution, as incorporated by the 14th Amendment and Section 1083.

Yamaguchi abstention does not apply because this foreign request falls under the auspices locally of a bail denial, and under settled law Yamaguchi abstention does not apply to bail, or a foreign, which is a form of bail in Wood current case (he has not yet gone to trial or convicted). So foreign request falls under bail.

**V. INJURY**

Describe with specificity what injury, harm, or damages you suffered because of the events described above.

Irreparable grievous denial of Wood spending time with his dying son.

**VI. RELIEF**

State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money.

Equitable relief - Emergency writ of Mandamus ordering Judge Pitts and Callucci to permit 4 hr visit in Street clothes with ankle monitor, with any police or consulate expenses billed to Wood account as with other fines and fees (back)

Equitable relief applies because the Judge Carlucci acts in bad faith in seeking retaliation for Wood's past bad acts, which should not have been allowed into evidence under the prohibition against character evidence.

Judge Carlucci knowingly ignored the character evidence rule impliedly by claiming Wood would be a danger to the child, a claim with no factual basis.

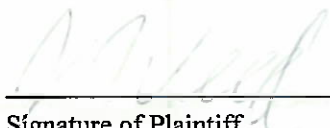
In doing so Judge Carlucci knowingly ignored the categorical imperative of family law - best interest of child - and it is in the child's best interest to see his father before dying.

Judge Carlucci's ghastly, unrealistic conditions should be enjoined and a writ of mandamus ordering visit as discussed above.

## VII. SIGNATURE

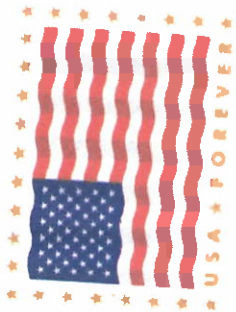
By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.

  
\_\_\_\_\_  
Signature of Plaintiff

  
\_\_\_\_\_  
Date

Inmate Name Jeffrey Weed Inmate # and 05-31276  
Lycoming County Prison  
PO Box 247  
Perry, MD 21131-0247



Office of Clerk  
Middle District of Pennsylvania  
1501 North 6th Street Suite 101  
Harrisburg, PA 17102

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PER [Signature] DEPUTY CLERK

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